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Comment: August 23, 2004

Bureau of Land Management, Alaska Office
Att'n: Northeast NPR-A Planning Team
222 West Seventh Avenue
Anchorage, Alaska 99513-7599

Dear Planning Team,

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Please accept these comments on the proposed amendment to the oil and gas leasing plan for the Northeast National Petroleum Reserve-Alaska Draft Environmental Impact Statement. I am especially concerned about the impact the Bureau of Land Management's proposal would have on the area around Teshekpuk Lake, one of the most unique and important wetlands in the entire Arctic.

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The DEIS grossly understates the potential threat of additional oil and gas development in the Teshelpuk Lake area. Oil and gas reserve estimates are based on "may" and "could", but the adverse impacts of oil and gas development on fragile natural resources are KNOWN, not just "may" and "could". BLM just needs to look at the San Juan Basin of New Mexico to see how the agency has allowed destruction of the natural environment in the name of gas development. I know this personally because I used to live there, and was horrified at the destruction when I last visited the area. So much for BLM's "mitigation measures that broadly apply to the Planning Area ... waste prevention, handling, and disposal; spill prevention and response; potential impacts of oil and gas exploration and development; protection of subsistence activities; and protection of vegetation, fish, wildlife, cultural, and paleontological resources" (Executive Summary Page 2). The New Mexico EIS said the same kind of thing, but the reality on the ground is entirely different. Why should the American public expect anything different from BLM in Alaska?

3

Your DEIS has the temerity to state (Executive Summary Page 4): "Because the land likely to be disturbed is a very small percentage of the 4.6 million surface acres the BLM manages in the Planning Area, impacts to soil, vegetation, water, and paleontological and cultural resources would be negligible to minor." Your entire Preferred Alternative B is based on this known falsehood. At least you manage to acknowledge that "Impacts to fish, wildlife, subsistence, and recreation extend beyond the immediate vicinity of the disturbed ground and, depending on location and protective measures used, could be out of proportion with a development's small footprint." "Out of proportion" is a excellent description of your entire proposed Alternative B. Protecting a mere 213,000 acres northeast of Teshekpuk Lake is entirely inadequate. For example, it ignores impacts to the yellow-billed loon, which is so wary and secretive that it is known to disappear at the approach of a single human, to say nothing about drilling pads and pipelines! The so-called Performance-Based Stipulations are too weak to be of value and can be waived for "economic reasons".

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Birds

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Alternatives

Alternative A, the "No Action" alternative, is the only alternative worth considering because it would maintain protection for the entire Teshekpuk Lake Surface Protection Area. This

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Alternatives

extraordinary ecosystem provides critical habitat for molting geese and nesting habitat for the Threatened Steller's eiders, declining northern pintails, rare and secretive yellow-billed loons and numerous other species. It also supports a vitally important caribou herd that Alaska natives depend on for their subsistence. If the caribou migration route is disturbed by oil and gas development and thereby altered, and the subsistence hunters have to go somewhere else to hunt, the native peoples will be severely adversely affected.

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Eighty-seven percent of the northeastern reserve is already open to oil and gas companies for leasing. In the five years since the original 1998 northeast plan, additional information and analyses have been accumulated that point toward significant impacts on fish and wildlife if more of this sensitive area is opened, such as the National Research Council's March 2003 report "Cumulative Environmental Effects of Oil and Gas Activities on Alaska's North Slope".

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It would be a huge mistake to risk the internationally significant ecological resources of Teshekpuk Lake for a short-term supply of energy, especially when we know that the United States cannot drill its way to energy independence. The amount of oil that "could" be found in the current Teshelpuk Lake Special Area is insignificant compared to the daily use of oil in the United States, but the ecological value of the current Special Area is irreplaceable.

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Again, I urge you to choose Alternative A, the "No Action" alternative, to protect the reserve's irreplaceable wildlife, wilderness and subsistence values for future generations.

Sincerely,

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Attached: None